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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHARLES "DARREL" JOHNSON, an
individual,

Plaintiff,

v.

NEVADA BEVERAGE CO., a Nevada
Corporation; DOES I through V, inclusive;
ROE Corporations I through V, inclusive,

Defendant.

Case No. 2:15-cv-01858-RFB-GWF

**STIPULATION AND ORDER TO DISMISS
WITH PREJUDICE AND ARBITRATE
CLAIMS**

Defendant Nevada Beverage Co. ("Defendant") and Plaintiff Charles "Darrel" Johnson ("Plaintiff"), by and through their counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff alleges that Pat Clark Enterprises, Inc. ("Pat Clark") and Defendant were his joint employers;

WHEREAS, during the course of his employment with Pat Clark, Plaintiff entered into an agreement to arbitrate all disputes arising out of or relating to Plaintiff's employment with Pat Clark (hereinafter, the "Arbitration Agreement"). A true and correct copy of the Arbitration Agreement is attached hereto as Exhibit A.

WHEREAS, Plaintiff filed his initial Complaint against Defendant (the "Action") on August 19, 2015, in the Eight Judicial District Court, Clark County Nevada;

WHEREAS, on August 29, 2015, Defendant removed the action to federal court;

1 WHEREAS, Plaintiff acknowledges that the claims alleged in the Complaint fall within
2 the scope of the Arbitration Agreement;

3 **IT IS HEREBY STIPULATED** by and between Defendant and Plaintiff as follows:

4 1. Plaintiff's claims shall be submitted to binding arbitration pursuant to the terms of
5 the Arbitration Agreement;

6 2. Plaintiff's Complaint shall be dismissed with prejudice, with each side bearing their
7 own attorneys' fees and costs incurred up to this point in this Action.
8

9 DATED: November 12, 2015

DATED: November 12, 2015

10 JACKSON LEWIS P.C.

LAW OFFICE OF STEVEN J. PARSONS

11
12 /s/Peter D. Navarro
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Attorney for Plaintiff

Attorneys for Defendant

17 IT IS SO ORDERED.
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21 RICHARD F. BOULWARE, II
22 United States District Judge

23 DATED this 17th day of November, 2015.
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26 4843-3882-4745, v. 1
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